

BOIES SCHILLER FLEXNER LLP

David Boies (*pro hac vice*)

333 Main Street
Armonk, NY 10504
(914) 749-8200
dboies@bsfllp.com

Maxwell V. Pritt (SBN 253155)
Joshua M. Stein (SBN 298856)
44 Montgomery Street, 41st Floor
San Francisco, CA 94104
(415) 293-6800
mpritt@bsfllp.com
jstein@bsfllp.com

Jesse Panuccio (*pro hac vice*)
Jay Schuffenhauer (*pro hac vice*)
1401 New York Ave, NW
Washington, DC 20005
(202) 237-2727
jpanuccio@bsfllp.com
jschuffenhauer@bsfllp.com

Joshua I. Schiller (SBN 330653)
David L. Simons (*pro hac vice*)
55 Hudson Yards, 20th Floor
New York, NY 10001
(914) 749-8200
jischiller@bsfllp.com
dsimons@bsfllp.com

*Attorneys for Plaintiff Christopher Farnsworth and
Representative Plaintiffs and the Proposed Class*

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

RICHARD KADREY, et al.,

Individual and Representative
Plaintiffs,

v.

META PLATFORMS, INC, a Delaware
corporation,

Defendant.

Case No. 3:23-cv-03417-VC

**DECLARATION OF JAY
SCHUFFENHAUER IN SUPPORT OF
STIPULATION AND [PROPOSED]
ORDER EXTENDING DEADLINE FOR
THIRD-PARTY SEALING OF SUMMARY
JUDGMENT BRIEFS**

1 I, Jay Schuffenhauer, hereby declare:

- 2 1. I am an Associate with the law firm Boies Schiller Flexner LLP, counsel for Plaintiffs and
3 the Proposed Class in this matter. I submit this declaration in support of the Parties'
4 Stipulation re Third-Party Sealing Deadline. I declare that the following is true to the best
5 of my knowledge, information and belief, and that if called upon to testify, I could and
6 would testify to the following:
- 7 2. On April 7, 2025, Plaintiffs filed their summary judgment opposition and reply brief. That
8 brief contains references to information over which two third parties assert confidentiality.
9 Plaintiffs also filed under seal three documents produced by those third parties as exhibits
10 to the brief.
- 11 3. I have corresponded with the third parties whose materials were filed under seal and have
12 apprised them of the procedure for submitting declarations in support of sealing. Those
13 discussions are ongoing, continuing into this week. The third parties are aware of the April
14 25, 2025 deadline for submitting declarations in support of sealing exhibits filed in
15 conjunction with the summary judgment briefs and intend to file declarations in support of
16 sealing on that date.

17
18 I declare under penalty of perjury that the foregoing is true and correct. Executed on this
19 14th day of April, 2025 in Washington, DC.

20
21 By: /s/ Jay Schuffenhauer
22 Jay Schuffenhauer
23
24
25
26
27
28